



VIA ECF AND EMAIL

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April 15, 2021

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312
Torres_NYSDChambers@nysd.uscourts.gov

David B. Conrad
Principal
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214 760-6158 direct

Re: Ramon Jaquez, et al. v. Techny Advisors LLC, Case No. 1:21-cv-00652 (S.D.N.Y)
Letter Motion Requesting Extension of Deadline for Parties to Submit Joint Status Letter and Proposed Case Management Plan and Adjournment of the Initial Conference

Dear Judge Torres,

Pursuant to the Court's January 21, 2020 Individual Practices in Civil Cases Rule I(C), Defendant Techny Advisors, LLC ("Defendant") submits the following letter motion requesting adjournment of the Initial Conference.

On March 31, 2021, Defendant sent Plaintiffs a pre-motion letter regarding the deficiencies in Plaintiffs' Complaint. Plaintiffs did not respond to this letter. On April 7, Defendant filed a pre-motion letter regarding its intent to file a motion to dismiss Plaintiffs' Complaint. Prior to Plaintiffs' time for responding to the pre-motion letter, Plaintiffs stated their intention to amend the complaint to which Defendant agreed. The Court granted the parties' agreed stipulation, permitting Plaintiffs to file an Amended Complaint by April 30, 2021 and ordered that Defendant move or otherwise respond to Plaintiffs' Amended Complaint on or before May 14, 2021.

Accordingly, Defendant respectfully requests that the Court extend the parties' current April 15, 2021 deadline to file their joint status letter and case management plan and that the Initial Conference be adjourned to a date convenient to the Court, but not before June 15, 2021 for the following reasons: (1) to allow the parties the opportunity to exchange potential pre-motion letters regarding the sufficiency of Plaintiffs' Amended Complaint; and (2) to allow Defendant the opportunity to answer other otherwise respond to Plaintiffs' Amended Complaint before requiring the parties to confer regarding case management.

On March 25, 2021, Plaintiffs made one request to adjourn the Initial Conference because the Defendant had not yet appeared in this action, to which Defendant consented and this Court granted. Plaintiffs have consented to this request.



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Sincerely,

A handwritten signature in black ink, appearing to read "David B. Conrad".

David B. Conrad
Counsel for Defendant Techny Advisors, LLC (*pro hac vice admitted*)

DBC/crh

cc: Yitzchak Zelman, Esq. *Via ECF and E-Mail*
Counsel for Plaintiffs Ramon Jaquez, et al.